

**EXHIBIT 2**  
**FILED UNDER SEAL**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC, )  
)  
Plaintiff, )  
vs. ) Case No.  
17-cv-00939-WHA  
UBER TECHNOLOGIES, INC.; )  
OTTOMOTTO, LLC; OTTO TRUCKING LLC, )  
)  
Defendants. )  
)  
)  
)

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UNDER THE PROTECTIVE ORDER  
VIDEOTAPED DEPOSITION OF  
GAETAN PENNECOT  
San Francisco, California  
Thursday, August 9, 2017  
Volume IV

Reported by:  
MARY J. GOFF  
CSR No. 13427  
Job No. 2675906  
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1 was derived, in part, from the work that you did 02:38:29  
2 previously on FAC lenses for the GBR3, such as shown 02:38:33  
3 in Exhibit 533? 02:38:37

4 MR. MUINO: Objection, form. 02:38:39

5 A Would you agree? 02:38:45

6 Q (BY MR. JAFFE) Would you agree that your 02:38:46  
7 work on creating the FAC lens for Fuji here in 02:38:47  
8 Exhibit 105 was derived, in part, from the work you 02:38:51  
9 did previously on FAC lenses for GBR3, such as those 02:38:56  
10 shown in Exhibit 533? 02:39:01

11 MR. MUINO: Same objection. 02:39:04

12 A So I mean, I gained a lot of experience 02:39:05  
13 with ZEONEX while at Google, so the optimization -- 02:39:08  
14 yeah, like, it helped me, like, probably in the 02:39:19  
15 optimization. Like, overall with ZEONEX I have been 02:39:23  
16 getting much better. 02:39:27

17 Q (BY MR. JAFFE) I mean, you're not sitting 02:39:28  
18 here telling me that [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 02:39:40

22 MR. MUINO: Objection, form. 02:39:41

23 A So I mean -- [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 02:40:01

1	[REDACTED]	02:40:05
2	[REDACTED]	[REDACTED]
3	[REDACTED] [REDACTED]	02:40:16
4	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]
6	[REDACTED]	02:40:26
7	Q (BY MR. JAFFE) All right. You're not	02:40:28
8	answering my questions. My -- my question is:	02:40:29
9	[REDACTED], is not	02:40:33
10	a coincidence, is it?	02:40:36
11	MR. MUINO: Objection, form.	02:40:38
12	A I mean, in some ways, yeah, it's -- it's	02:40:40
13	in my head. I have, like, some experience from	02:40:46
14	before, and I -- and you know -- like, you're always	02:40:49
15	impacted by your previous experience.	02:40:52
16	Q (BY MR. JAFFE) Right. So the design here	02:40:56
17	in Exhibit 105 is based, in part, on your work on	02:40:57
18	creating the G -- GBR FAC lens shown here in	02:41:02
19	Exhibit 533, right?	02:41:06
20	A So I --	02:41:07
21	MR. MUINO: Objection, form.	02:41:07
22	A -- I used my experience. You know, like,	02:41:07
23	my previous experience is always here in my head, so	02:41:10
24	I don't know in which sense I used it or not. I --	02:41:16
25	I don't -- was I thinking -- I don't know.	02:41:22

1 [REDACTED] 02:41:29

2 [REDACTED] 02:41:33

3 [REDACTED]

4 [REDACTED]

5 [REDACTED] So some of it maybe, 02:41:45

6 like -- you know, my work at Google may have 02:41:48

7 impacted a little bit of my work on the FAC lens. 02:41:58

8 MR. MUINO: Jordan, I think it's been more 02:42:32

9 than an hour since our last break. Is this a good 02:42:33

10 time for a break? 02:42:37

11 MR. JAFFE: Sure. 02:42:39

12 THE VIDEOGRAPHER: Off the record at 02:42:41

13 2:42 p.m. 02:42:43

14 (A break was taken from 2:42 p.m. to 02:42:44

15 2:55 p.m.) 02:42:46

16 THE VIDEOGRAPHER: Back on the record at 02:55:12

17 2:55 p.m. 02:55:15

18 Q (BY MR. JAFFE) I'm going to mark as 02:55:18

19 Exhibit 539, a document labeled UBER 86702. 02:55:18

20 (Exhibit 539 was marked for identification 02:55:26

21 and is attached to the transcript.) 02:55:26

22 Q (BY MR. JAFFE) Mr. Pennecot, do you see I 02:55:38

23 have marked -- marked as -- Exhibit 539? 02:55:39

24 A I see. 02:55:48

25 Q This is a transmit board for the Fuji, 02:55:50